

UNITED STATES BANKRUPTCY COURT
Western District of North Carolina

FILED
U.S. Bankruptcy Court
Western District of NC

APR - 7 2025

Christine F. Winchester, Clerk
Charlotte Division

IN RE: JAMIE LOUISE CLOER

Case No. 25-50041

Chapter 7 (Chapter 13 Conversion)

**STATEMENT IN RESPONSE TO ORDER TO SHOW CAUSE AND IN
SUPPORT OF MOTION TO CONVERT**

Comes now Jamie Louise Cloer, appearing as the Authorized Representative and Real Party in Interest for the Estate, and respectfully offers this statement in response to the Court's Order to Show Cause and in support of the pending Motion to Convert this case from Chapter 7 to Chapter 13.

1. I completed my credit counseling course on time, prior to filing this bankruptcy case, as required under 11 U.S.C. § 109(h).
2. I inadvertently submitted the wrong certificate of credit counseling at the time of filing. I had completed two different courses and mistakenly uploaded the incorrect one.
3. Upon discovering the error, I immediately filed the correct certificate with the Court, reflecting timely completion.
4. This was a good faith clerical mistake, not a failure to comply with the Bankruptcy Code.
5. A Motion to Dismiss was filed based on the incorrect certificate, but I respectfully submit that such dismissal is now moot in light of the correction on record.

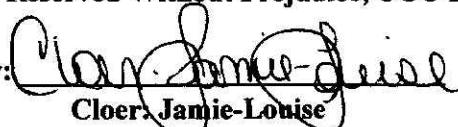
6. I have also filed a Motion to Convert this case to Chapter 13 under 11 U.S.C. § 706(a), and I am prepared to move forward in good faith under that chapter.

WHEREFORE, I respectfully request that:

- The Motion to Dismiss be denied as moot;
- The Motion to Convert to Chapter 13 be granted;
- And any further relief deemed just and proper be entered in favor of the Petitioner.

Expressed Date: 30, March 2025

**Respectfully Submitted in Good Faith,
All Rights Reserved Without Prejudice, UCC 1-308**

By: 
Cloer, Jamie-Louise

Authorized Representative and Executor
for the Legal Estate Acting in Private
Capacity for: **JAMIE LOUISE CLOER** and
JAMIE CLOER KIRBY (Legal Entities).